

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,)
Plaintiff,)
)
v.) Docket No. 2:23-CR-4-1
)
RONALD HARRIS, AKA RIZZ,)
Defendant.)

MOTION FOR DETENTION

NOW COMES the United States of America, by and through its attorney, Nikolas P. Kerest, United States Attorney for the District of Vermont moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. This defendant is eligible for detention because the case involves an offense under the Controlled Substances Act for which a maximum term of imprisonment of ten years or more is prescribed. *See* 18 U.S.C. § 3142(f)(1)(C).
2. Reason For Detention. The Court should detain the defendant because there are no conditions of release which will reasonably assure the safety of any other person and the community and the defendant's appearance as required. Harris appears to have multiple felony convictions in Vermont and Pennsylvania, including convictions for firearms-related offenses. While he resides in Pennsylvania, the investigation in this case has shown he regularly makes short duration trips (less than 24 hours) to Vermont to engage in criminal activity associated with the charged drug trafficking conspiracy. Harris lacks ties to the area and demonstrates a pattern of repeat criminal activity that makes him both likely to flee the very serious charges now pending against him and a danger to the Vermont community because of the drugs he distributes. There are no conditions that can address both of these concerns.

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant under § 3142(e). The presumption applies because there is probable cause to believe the defendant committed a drug offense punishable by more than 10 years.

4. Time For Detention Hearing. The United States requests the court conduct the detention hearing upon completion of the pretrial services report.

Dated at Burlington, in the District of Vermont, January 18, 2023.

Respectfully submitted,

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